BARACK FERRAZZANO KIRSCHBAUM & NAGELBERG LLP

200 West Madison, Suite 3900

Chicago, IL 60606

Tel. No. 312-984-3100 Fax No. 312-984-3150 William J. Barrett (IL 6206424) Kimberly J. Robinson (IL 6194420) Hearing Date and Time: May 31, 2007 at 10:00 a.m. Response Date and Time: May 24, 2007 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re Chapter 11

Case No. 05-44481 (RDD) DELPHI CORPORATION, et al.,

> Debtors. Jointly Administered

NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on May 23, 2007, the undersigned caused to be filed the attached Response to Debtors' Thirteenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. §502(B) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Protective Insurance Claims, (D) Insurance Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims And Untimely Tax Claims, And (F) Claims Subject To Modification, Tax Claims Subject To Modification, And Claims Subject To Modification And Reclamation Agreement with the Clerk of the United States Bankruptcy Court, a true copy of which is herewith served upon you.

Dated: May 23, 2007

/s/ William J. Barrett

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Attorneys for Motion Industries, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Response to Debtors' Thirteenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. §502(B) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Protective Insurance Claims, (D) Insurance Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims And Untimely Tax Claims, And (F) Claims Subject To Modification, Tax Claims Subject To Modification, And Claims Subject To Modification And Reclamation Agreement was filed electronically this 23rd day of May, 2007 and the foregoing was sent via e-mail or overnight delivery to the following parties:

Delphi Corporation 5725 Delphi Drive Troy, Michigan 48098 Attn: General Counsel (served via overnight courier)

Honorable Robert D. Drain United States Bankruptcy Judge United States Bankruptcy Court for the Southern District of New York One Bowling Green, Room 610 New York, New York 10004 (served via overnight courier) Skadden, Arps, Slate, Meagher & Flom 333 West Wacker Drive Suite 2100 Chicago, Illinois 60606 Attn: John Wm. Butler, Jr. Esq.

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/s/ William J. Barrett
William J. Barrett